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Hon. Leonard B. Sand
Judge, U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Donoghue vs. Local.com and Hearst Communications, Inc., 07 CV 8550 (LBS)

Your Honor:

Further to my letter of June 17, 2008, addressed to you:

1. Counsel for Hearst Communications, Inc. has agreed that further discovery pertinent to the pending motion will not be required.
2. Counsel for Hearst Communications, Inc. has agreed that conversion of Hearst's motion for dismissal into a motion for summary judgment under Rule 56 is appropriate.
3. Counsel for Hearst and for plaintiff have agreed to the following supplementary briefing schedule:
 - a) Hearst's supplementary brief to be served and filed by July 16, 2008.
 - b) Plaintiff's and/or Local.com's answering supplementary brief to be served and filed by July 30, 2008.
 - c) Hearst's supplementary responsive brief to be served and filed by August 11, 2008.
 - d) A re-convened hearing or acceptance of the motion on submission to be announced by Your Honor at your convenience.

MEMO ENDORSED

DAVID LOPEZ

Hon. Leonard B. Sand
June 23, 2008
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We respectfully ask that the foregoing be ordered.

Very truly yours,
David Lopez

DL/el

cc: Alan Mansfield, Esq.
William A. Wargo, Esq.
Jonathan L. Fried, Esq.
Daniel E. Donoghue, Esq.

S O O R D E R E D:

Leonard B. Sand, U.S.D.J.
New York, New York
June 26, 2008

MEMO ENDORSED